

FILED

SEP 12 2019

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT FOUNTAINE,

Defendant.

No

**4:19CR00745 HEA/JMB**

**INDICTMENT**

**COUNT ONE**

The Grand Jury charges:

On or about December 30, 2015, within the Eastern District of Missouri, the defendant,

**ROBERT FOUNTAINE,**

in a matter within the jurisdiction of the Social Security Administration, a department of the United States, did knowingly and willfully make and cause to be made a false, fictitious, and fraudulent statement and representation as to a material fact and did make and use and cause to be made and used a false document, knowing the same to contain a materially false, fictitious and fraudulent statement, in that, in a document entitled "Representative Payee Report," he did state and represent and cause to be stated and represented that another individual, E.B., was alive and living at the same address as the previous year, when **ROBERT FOUNTAINE** well knew, E.B. was deceased and had been deceased since 1999.

In violation of Title 18, United States Code, Section 1001(a).

**COUNT TWO**

The Grand Jury further charges:

From on or about September 29, 2017 through December 31, 2017, within the Eastern District of Missouri, the defendant,

**ROBERT FOUNTAINE,**

did embezzle, steal, purloin, or knowingly convert to his use, and the use of others, money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: \$1,133.00 in the form of Social Security Administration Supplemental Security Income benefit payments, as representative payee of E.B., creating a total loss to the government in excess of \$1,000.00.

In violation of Title 18, United States Code, Section 641.

A TRUE BILL.

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FOREPERSON

JEFFREY B. JENSEN,  
United States Attorney

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DIANE E.H. KLOCKE, #61670MO  
Special Assistant United States Attorney